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Motors Financial Company, Inc.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CYNTHIA L. MUYDERMAN, an
individual,

Plaintiff,

vs.

GENERAL MOTORS FINANCIAL
COMPANY, INC., a foreign corporation;
TRANS UNION LLC; a foreign limited-
liability company;

Defendant.

Case No.: 2:20-cv-02172-APG-DJA

Compl. Filed: November 27, 2020

**MOTION TO EXTEND DEFENDANT
AMERICREDIT CORP./GENERAL
MOTORS FINANCIAL COMPANY,
INC.'S TIME TO RESPOND TO
COMPLAINT**

(SECOND REQUEST)

Defendant AmeriCredit Corp./General Motors Financial Company, Inc.
("AmeriCredit/GM") hereby brings this Motion to Extend Defendant AmeriCredit Corp./General
Motors Financial Company, Inc.'s Time to Respond to Complaint ("Motion") pursuant to LR IA
6-1.

FACTUAL BACKGROUND AND PROCEDURAL HISTORY

A. Plaintiff filed the Complaint ("Complaint") against Defendants on or about
November 27, 2020.

B. AmeriCredit/GM was served with the Complaint on or about January 28, 2021.

C. AmeriCredit/GM's initial deadline to respond to the Complaint was March 29,
2021.

1 D. On March 30, 2021, AmeriCredit/GM filed a Stipulation to Extend Defendant
 2 AmeriCredit/GM's Time to Respond to Complaint ("First Request"). ECF No. 12. In the First
 3 Request, Plaintiff and AmeriCredit/GM agreed that AmeriCredit/GM would have through April
 4 5, 2021, to respond to the Complaint in order to give AmeriCredit/GM time to investigate
 5 Plaintiff's claims and prepare a proper response, and for the parties to discuss a potential
 6 resolution of this matter.

7 E. On March 31, 2021, this Court issued an order granting the First Request and
 8 ordered AmeriCredit/GM to file a response to Plaintiff's Complaint by April 5, 2021. ECF No.
 9 14.

10 ARGUMENT

11 F. AmeriCredit/GM now seeks a second request for extension to respond to
 12 Plaintiff's Complaint. Specifically, AmeriCredit/GM seeks a modest one week extension from
 13 the current deadline, which is April 5, 2021, to respond to Plaintiff's Complaint. This would
 14 permit AmeriCredit/GM up to and including April 12, 2021, to respond to Plaintiff's Complaint.

15 G. There is good cause to grant this Motion because AmeriCredit/GM requires just a
 16 bit more time to investigate Plaintiff's payment history and to update the credit reporting. In
 17 light of the foregoing, AmeriCredit/GM expects settlement to be achievable and imminent, and
 18 the matter to be resolved shortly, if all goes well without any unexpected delays.

19 H. This Motion is filed in good faith and not intended to cause delay, but is intended
 20 to conserve resources in light of possible resolution of this matter.

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I. Accordingly, pursuant to Local Rule IA 6-1, AmeriCredit/GM respectfully request that the Court extend AmeriCredit/GM's time to respond to Plaintiff's Complaint through April 12, 2021.

Dated this 5th Day of April, 2021.

LEWIS ROCA ROTHGERBER CHRISTIE

By: /s/ Matthew Tsai

J Christopher Jorgensen

Nevada Bar No. 5382

Matthew R. Tsai

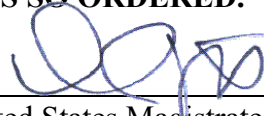
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*Attorneys for Defendant AmeriCredit
Corp./General Motors Financial Company,
Inc.*

ORDER

IT IS SO ORDERED.



United States Magistrate Judge

Dated: April 6, 2021

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of April, 2021, I caused a true and accurate copy of the foregoing document entitled ***Defendant AmeriCredit Corp. dba General Motors Financial Company Inc. 's Motion to Extend Time to Respond to Complaint*** to be filed with the Clerk of the Court via the CM/ECF system, which will send an electronic copy to all interested parties.

/s/ Annette Jaramillo

An employee of Lewis Roca
Rothgerber Christie LLP